

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

DONALD FITZGERALD  
P.O. Box 75  
Thurmont, Maryland 21788

PLAINTIFF

VS.

CIVIL NO. 1229E

DOUGLAS R. PIPER, AND  
BETTY M.S. PIPER, his wife  
Rt. 2  
Fairfield, Pennsylvania 17320

AND

THE TOWN OF EMMITSBURG  
Serve: Richard Preston, Mayor  
City Hall  
Emmitsburg, Maryland

DEFENDANTS

\* \* \* \* \*

COMPLAINT TO QUIET TITLE AND/OR TO REFORM DEED

Now comes Donald Fitzgerald, Plaintiff, by Lawrence E. Finegan and Rosenstock, Burgee & Welty, P.A., his attorneys, and represents unto this Court as follows:

1. Plaintiff is the owner of a certain parcel of property by virtue of a Deed dated May 16, 1975, and recorded in Liber 960, Folio 868, Land Records of Frederick County, Maryland. A copy of such deed is attached as Exhibit 1.

2. The Defendants, Douglas R. Piper and Betty M.S. Piper, his wife, are the owners of an adjacent parcel of land by virtue of a Deed dated April 23, 1982, recorded at Liber 1169, Folio 824, Land Records of Frederick County. A copy of such deed is attached as Exhibit 2.

3. That the Town of Emmitsburg is the owner of a parcel of land adjacent thereto, comprising a portion of the Town of Emmitsburg Watershed.

4. That the parcel in dispute herein is more accurately described by